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IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA**RECEIVED**

2020 OCT -9 A 9:37

JIMMY HOLLIMAN W/M ET,AL INMATES:ELMORE CORRECTIONAL FACILITY:

Full name and prison name of
Plaintiff(s) James Holliman 278331DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

v.

CIVIL ACTION NO. 2:20-cv-00815-RAH-CSC
(To be supplied by Clerk of U.S. District
Court)

JEFFERSON DUNN, CHERYL PRICE.)

CITY; COUNTY, COMMISSION ELMORE)
MAYOR OF ELMORE COUNTY, ALABAMA)
ELMORE HEALTH DEPARTMENT, BUILDING)
INSPECTOR: ET AL DEFENDANTS)
CHARLES GRADITT et al)
(Name of person(s) who violated your)
constitutional rights. (List the names)
of all the person.))

2:20-cv-831-ECM-SRW

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☐ No ☒
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☐ NO ☒
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) NADefendant(s) NA

2. Court (if federal court, name the district; if state court, name the county)

N

A

3. Docket number NA
4. Name of judge to whom case was assigned _____
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) _____
6. Approximate date of filing lawsuit N
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT NA
ELMORE CORRECTIONAL FACILITY.
2690 MARION SPILLWAY RD. ELMORE, ALA 36025

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED ELMORE CORRECTIONAL

IN PRESENT OF COI. TIEARA M. MAHONE, COI. C. JOHNSON, R. JOHNSON, COI. WILSON, COI. CHRIS-
TOPHEN.

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

- NAME ADDRESS SUIT-310
1. CHARLIE GRADDITT, 100 CAPITAL COMMERCE BLV MONT ALA 36117
2. JEFFERSON DUNN, 301 SOUTH RIPLEY ST. MONTGOMERY, AL 36104 ET, AL.
3. Elmore County Court House, Elmore AL 36025
4. CITY, COUNTY COMMISSION ELMORE MAYOR, ELMORE, ALA 36205 et, al
5. ELMORE COUNTY HEALTH DEPARTMENT, ELMORE, ALA 36025 ET, AL.,
6. A.D.O.C. I.N.I. 301 SOUTH RIPLEY ST MONTGOMERY, AL 36104 ET, AL.,
7. WARDEN JEFFERY BALDWIN 2690 MARION SPILLWAY RD ELMORE, AL 36025
8. CAPTAIN(S) CHARMELE LUCKIE, CHARLE E. MCKEE 2690 MARION SPILLWAY RD
9. A.D.O.C. Regional Board Director ELMORE, ALA 36025

THE DATE UPON WHICH SAID VIOLATION OCCURRED
DURING THE YEAR OF 2020 FIRST AROUND FEB MARCH APRIL MAY.

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: I WAS SEVERELY BURNED WITH "HOT" WATER BY INMATES WHILE

THE NAMED OFFICER(S) WATCHED. NEGLECT TO PROTECT, PROVIDE ADEQUATE SECURITY, DENIAL OF A MEDICAL FACILITY AT ELMORE PRISON. LACK OF SECURITY, THE BUILDING IS DILAPIDATED, RATS, ROCHES, "MOLD" ANT'S, LEAKING CEILINGS AND THE SHOWER(S) ARE FULL OF THICK "MOLD" ON FLOORS ALSO. WIRES ALL OUT OF THE SOCKET'S, SHOWER(S) ARE LEAKING THROUGH WALL'S INTO T.V.

ROOM OF INMATES. OVER CROWDING - Living Area Ceilings Disruptive Add Leaking all over the inmates. There's no proper heat to be provided to keep the inmates properly warm as it's getting cold now and heat is needed to fight off Covid-19. 8th and 14th Unconstitutional

2. Mr. A.D.O.C. I.N.I.

301 RIPLEY ST. A.D.O.C. Regional Board Director
Mont. AL 36104

142
31-32 C1-C2
Make in rights
in dorms,

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

~~THE PRISON COMMISSIONER IS OVER THE OPERATION OF A.D.O.C AND EMPLOYEES AND ITS UP KEEP. THE OFFICERS IN THIS LAW SUITE HAS SHOWN NEGLECT AND ABUSE TO CAUSE ME HARM AND ASSAULT BY OTHER INMATES WHILE THE OFFICER LOOK AND DID NOTHING AT ALL TO PREVENT THIS OFFENSE FROM HAPPENING. WHERE OTHER INMATES ALSO HAVE BEEN ASSAULTED~~DOCUMENTS ATTACHED:

GROUND TWO:
THEIR IS A CONSTANT USE OF FORCE BEING USED HERE AT ELMORE BY THE NAMED DEFENDANTS LISTED IN THIS LAW SUITE:WHO HAVE VIOLATED A.R.208 OFFICIAL CONDUCT TO CAUSE INJURY,PAIN,ABUSE,HASSAMENT,ASSAULTS,ON INMATES BY OFFICE

SUPPORTINGFACTS:THIS IS A CIVIL RIGHT VIOLATION OF 8th AND 14thAMENDMENT RIGHTS TO BE PROTECTED FROM HARM,ABUSE,NEGLECT,ASSAULTS,WHEN KNOWN BY THE OFFICIALS OF THE INJURIES THAT ARE ABOUT TO HAPPEN WHEN THE OFFICERS HAVE PLACED THE HIT"S ON THE INMATE.THESE OFFICERS ARE TO BE PUT IN FEDERAL PRISON.WHERE THE FOOD, AND CLASSIFICATION HERE AT ELMORE PRISON IS ALSO

BROKE DOWN,RATS IN THE KITCHEN,ROCHES,ANT'S,MICE,FOOD UNNUTRISHING.NOT AT ALL "FRIING CHICKEN ENOUGH IN THE MOTH'S ON "SUNDAY"S" WHERE BAKE, AND GROUND THREE:INMATES FOOD IS NOT ENOUGH OR NUTRITION OR HEATHY TO EAT. BAR-B-QUE,THE MEAT IS NOT BEING COOKED ENOUGH TO SAY IT DUNN ENOUGH TO EAT WHERE I WAS ASSAULTED BY INMATES AND THESES OFFICIALS NEW OF IT AND DID NO ATTEMPT TO HELP ME OUT,WHERE COI,OFFICER BUCK W/M ASSASTED ME AFTER BEING NEGELECTED ASSALTED,AND DENIED THE ADEQUATE MEDICAL CARE BY THE A.D.O.C.

SUPPORTINGFACTS:A.D.O.C. HAS AN OFFICER "ROVER" A.R.506 AND "DORM OFFICER STANDARD OPERATING PROCEDURE,508.WHERE NO OFFICER WAS IN THE DORM,AND THE

OTHER INMATES IN THIS CASE AS PLAINTIFF WERE SOME OF THEM SABEDD,AND NO OFFICERS WERE PRESENT AS OF THE RULES OF A.D.O.C.NEGLECTED TO DO THEIR JOB COUNTY COSSISSIONERS,CITY COUNSELMEN,AND MAYOR OF ELMORE.KNOWS THAT THIS BUILDING ID CONDIM AND UNFIT TO HAVE ANY (LIFE-FORM) LIVING IN THIS UNFIT PLACE AS A PRISON WITH ASBESTISS,MOLD IN SHOWERS,THE ROOF-RATS,ROCHES,MICE CLASSIFIATION BRAKE DOWWN.WERE THEY ARE NOT PUTTING INMATS IN FOR PROPER

PLACEMENT AS OF THE RULES STATES FOR HONOR-CAMP'S AND WORK-RELEASES,BUT IN STAED, "KEE-HH...."DRINK-COFFEE-ECT,"GO-TO-LUNCH ALL-DAY"AND COME BACK AND STILL DO NOTHING AT ALL DENING THE DHT INMATES PROPER PLACEMENT AS OF THE A.D.O.C. CLASSIFICATION MANUAL STATES "VIOLATES INMATES DUE PROCESS RIGHTS TO PROPER PLACEMENT AND NOT TO TELL HIM WHY HE'S NOT AT PLACE HE SHOULD BE. VIOLATED PLAINTIFFS 8th AND 14th AMENDMENT RIGHTS UNDER THE U.S.CONST,1901.

RECEIVED

OCT -9 A 9 38

DEBRA P. BACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

JIMMY HOLLIMAN, #224448 W/M

PLAINTIFF, et, al, .

ALOYSIUS THADDEUS HENRY. 152683.

Richard Martin 15428 B/M
PLAINTIFF, et, al, .

CORNELIUS JACKSON 27833/

VS. W. 2/10/2000 24/11/11

CASE NO. _____

ELMORE COUNTY COMMISSIONER et, al

ELMORE CITY COUNSEL MEN et, al, .

PRISON

THIS IS A CIVIL LAW SUITE BEING FILED BY INMATES AT ELMORE PRISON AGAINST THE CITY OF ELMORE AND THE COUNTY OF ELMORE FOR THE NEGLGENT ACTS OF 8th AND 14th AMENDMENT CONSTITUTIONAL VIOLATIONS TO SUBJECT INMATES TO CRUEL AND UNUSUAL PUNISHMENT, LACK OF SECURITY, LIVING IN DANGEROUS BUILDING WITH WIRES HANGING FROM THE PLUGS, AND HOT WATER PIPES ARE ALL OVER THE HEADS OF INMATES WITHIN THE BUILDING OF ELMORE WHICH IS A SAFETY HAZARD, AND ROCHES AND RATS AND SNAKES AND BUGS AND THE BATHROOMS ARE DELAPIDATED FILTHY, 8-TOILET'S AND 8-SINK'S AND 1-PISS-UNIRAL WITH 196 OR 197 INMATES WITHIN ONE DORM. VENTILATION IS VERY BAD NO PROPER AIR FLOW THREW WINDOWS OR BLOWERS THAT ARE NOT WORKING ON THE TOP OF THE BUILDING HERE AT ELMORE PRISON. AND THE FOOD IS VERY UNCLEAN UNHEALTHY, AND NOT NUTRIONING GLASSES IN KITCHEN NOT CLEAN TO DRINK OUT OF AND THE KITCHEN IS FULL OF RAT'S AND MICE AND BUG'S AND ROCHES AND IT'S DUE TO BE CLOSE DOWN BY THE HEATH DEPARTMENT WHERE ONLY WARDENS FROM OTHER PRISON(S) THREWOUT ALABAMA DEPARTMENT OF CORRECTIONS IS THE PERSON'S THAT STATE THESE PRISON(S) ARE LIVEABLE AND MANAGABLE, AND SAFE, AND SECURE, AND KITCHEN(S) ARE UP TO STANDARD(S) WITH PROPER KITCHEN EQUIPEMENT TO MAINTAIN THE KITCHEN UP KEEP AND CLEANNESS WHICH IS NOT BEING DONE AT ALL.

THE OVERCROWDING IS A FIRE & SAFETY HAZARD OF THE ALABAMA DEPARTMENT OF "HEALTH STATE OF ALABAMA." FIRE MARSHALL - ELMORE WILL BE NOT ABLE TO ALLOW INFESTED BUILDINGS TO STILL OPERATE

Jimmy Holloman et al
 Petitioner STATES: A Inmate Name CORNELL JACKSON
 Died at Elmore from ^{Feb 2 - 2020} LACK OF Medical Treatment,
 The Denial OF Medical Treatment ^{in CA#}. The Inadequacy OF
 A Medical FACILITY at THIS PRISON IS A SERIOUS
 Matter, Where More Than (20) Inmates Have died
 here at THIS PRISON due to Negligence, Neglect,
 OVER CROWDING, UNDER STAFFED, LACK OF PROPER
 TRAINING, AND LACK OF MEDICAL LIFE SKILLS ON
 SAVING LIVES. AND NO CAMERAS operating in
 The Dorms OF A1-A2 - B1-B2 - C1-C2
 BACK-GATE ~ Holding Cell'S BACK-GATE
 AND Inmate Housing in The Shift Office
 Without ANY Receiving WATER, OR TOILETS
OR Showers FOR The Inmates TO Shower
 When Needed IS A Automatic constitutional
 Violation Illegal Cell Housing. (SHIFT OFFICE),
 Where The CAPACITY within The Building's here are at Full
 Capacity, AND IS A Health care issue upon population are
 Five HALLS, While The JFC AND 14th Street
 Rights OF Plaintiffs - Wrongful Death OF Inmate
 JACKSON in Feb 2020. at Elmore to OFFICIALS.

PLAINTIFF'S STATE THIS IS A CIVIL ACTION SEEKING DAMAGES AGAINST
 DEFENDANTS FOR COMMITTING ACTS, UNDER COLOR OR LAW, WHICH DEPRIVED
 THE PLAINTIFF'S OF RIGHTS SECURED UNDER THE CONSTITUTION AND LAWS OF
 THE UNITED STATES. *Sept 19th 57th over 30-60-frames did have at Brown
 Prison out of the past 10-years or less. When this is a wrongful death Negligent Claim
 for Corneilus Johnson 288331, who died due to the injuries allowed him to die when other
 inmates told him to seek help when every Cub's has a phone to call (911) This is Negligence*
 PLAINTIFF JIMMY HOLLIMAN, WAS SEVERLY BURNED BY SCALDING "HOT" WATER

WHERE OFFICER BUCK ASSISTED THIS INMATE WHEN OTHER OFFICERS WERE NOT
 PRESENT AT ALL. *SEE The photos provided as stripper proof*
 JUST AS WHEN THE INMATE ALOYSIUS THADDEUS HENRY WAS ASSAULTED BY THE
 OFFICERS AND THE INMATE THAT BEAT HIS BACK WITH A BELT AND STICK WHILE
 OFFICERS LOOKD AT THE ASSAULT ON THE INMATE WHICH WAS CALLED ON BY THE
 OFFICERES AT ELMORE, BOTH JOHNSONS AND THE OTHER OFFICER NO LONGER WORK
 AT ELMORE WHO WAS FIRED FOR ABUSE AND ASSAULTS ON INMATES JUST AS MYSELF.

PLAINTIFF STATES THAT THE CLOTHING IN THE PRISON IS BAD WITH NO SOCK'S
 NO PAINT'S AND NO T-SHIRT'S AND NO SHOES OR BOOTS FOR THE INMATES AND
 NO SOAP OR TOWELS FOR THE INMATES *Baker's* THEN IN THE BATHROOMS AT ELMORE,
 THE SILLING HAS FALLIN DOWN IN ALL OF THE BATHROOM IN THE DORMS OF A-1
 A-2 B-1 B-2 C-1 C-2. WHERE THROUGH THE TIME OVER THE YEARS THE VENTALATION
 VENTS WITHIN THE DORMS ARE OLD AND NEED REPLACING WERE THEY ARE NOT
 WORKING AT ALL PROPERLY, AND THE WATER IS VERY BAD. SMELL'S LIKE FECES.
 THE LACK OF SECURITY AND THE LACK OF A MEDICAL FACILITY TO PROVIDE THE
 PROPER MEDICAL TREATMENT FOR THE INMATES AFTER OR BEFORE AN INMATE IS
 INJURED IS VERY MUCH NEEDED TO PROTECT THE (LIFE) OF THE PERSONS *HERE*
 THERE IS AN OFFICER REGULATION, AND A ROVER REGULATION FOR THE DORMS, *A.D.O.C. Reg. R-506
 506*
 WERE THE OFFICERS DO NOT PATROL THE DORMS AS REQUIRED AS OF THE RULES
 OF A.D.O.C. *OR protect inmates from harm*

COMPLAINTEIFF

I WAS ASSAULTED

INMATES, ~~STAYS~~ THAT CHARLIE GRADDITT IS A CONFLICT OF ENTREST TO SIT ON THE ALABAMA BOARD OF PARDONS AND PAROLES AND HAS INMATES IN PRISON THAT HE ALSO FOUGHT TO KEEP BEHIND BARS WHEN GRADDITT WAS THE ATTORNEY GENERAL OF THE STATE OF ALABAMA, AND WAS A JUDGE IN MOBILE COUNTY, ALABAMA WHICH IS A CONFLICT OF ENTREST WHERE INMATES WHO BEEN DENIED PAROLE MUST FILE THERE APPEAL TO THE DIRECTOR OF PAROLE BOARD: WHICH IS CHARLIE GRADDITT. THE PERSON WHO SENTENCE YOU TO PRISON. WHY IS IT, I CAN SEE THIS, IM SURE GOV. KAY IVEY KNOWS THIS: WHERE THIS IS A VIOLATION OF INMATES 8th AND 14th AMENDMENT RIGHTS UNDER EQUAL PROTECTION CLAUS. AND HE SHOULD NOT BE ON THE PAROLE BOARD AT ALL, AND HES HA SENTENCED INMATES TO PRISON, AND NOW MUST DETERMINE THEIR PAROLE FATE:

CHARLIE GRADDITT, IS A CONFLICT OF ENTREST TO THE INMATES IN PRISON AS OF BEING GRANTED PAROLE WHEN HE SENTENCED SOME OF THE INMATES FROM MOBILE, AND FOUGHT TO KEEP OTHERS IN PRISON OVER THE PAST DACADES.

*This now got people in prison over 30 yrs ago
on this 446 - Act of 1975, which is illegal and
which is "Not Law," But A unconstitutional
infringement that violates the 8th and 14th
Amendment Rights of the Defendant.*

*The officials here at Elmore also will not provide the inmates
with air heat at all within the dorms. Where blowers
should be placed within the dorms to keep the inmates
warm in this cold weather.*

PLAINTIFF'S WHERE DEPRIVED OF THEIR CONSTITUTIONAL RIGHTS BY THE
NEGLIGENT ACTS OF THE DEFENDANTS THAT ARE LISTED WITHIN THIS COMPLAINT.

PAIN AND MORE PAIN WHERE THE PLAINTIFF HAS NOT RECEIVED ANY ADEQUATE
MEDICAL TREATMENT FOR HIS INJURIES AFTER BEING SCALDED BY THIS VERY
"HOT" WATER WHERE THE PLAINTIFF HAD TO RECEIVE SKIN GRAFT TO REPLACE
SKIN FROM WHERE IT WAS LOSS FROM THE "HOT" WATER.

PLAINTIFF STATES THAT THERE IS NO REHABILITATION PROGRAMS OR SCHOOL
PROGRAMS TO TAKE AT THIS TIME. AND WHERE INMATES ARE TO TAKE PROGRAMS
AS OF SAP OR ANGERMANAGEMENT OR STRESSMANAGEMENT ELMORE PRISON DO NOT
HAVE A TRAINING PROGRAM SCHOOL OR

*Plaintiff states, the 8th and 9th Court Districts comes from the
over crowding, where this camp, and the 12th is not enough
to hold this many inmates at all. It should not cost right
to the over crowding and living conditions which are dangerous
The over:*

CERTIFICATE OF SERVICE

I HAVE SERVED A COPY OF THE FOREGOING ONTO THE COURTS BY U.S. MAIL
ON THIS THE 28th DAY OF Sept 2020.

PLAINTIFF'S Quincy Williams A.I.S. 224648

PLAINTIFF'S Ally 1624 A.I.S. 124111

2690 MARION SPILLWAY RD.

ELMORE, ALABAMA 36025

DORM-B1

CCF:

PLAINTIFF STATES NO OFFICERS HERE AT ELMORE IS WEARING A "MASK" AND THE ~~OFFICERS~~ ARE ENTERING THE DORMS WITHOUT GLOVES AND WERE NOT GETTING ANY HYGINE~~N~~ SUPPLIES AT ALL. WHERE INMATE MOVEMENT IS RESTRICTED FOR NO REAS~~N~~ AT ALL. THE DOORS ON THE DORMS ARE ALWAYS LOCKED DOWN WHILE THE OFFICERS ARE IN THE CUBIC ON THE PHNE ALL DAY AND ALL NIGHT ANDTHE OFFICERS CUBIC AREA IS SECURED MORE TIGHTLY THEN THE INMATES SECURITY. WHERE OFFICERS JUST CAUSE FIGHTS BETWEEN INMATES ON PERPURPOSE AND THE SUPERVISORS ALLOWIT TO HAPPEN, AND FIGHTS ON OTHERINMATES A~~N~~L THEWIME.

THIS ABUSE AND ILL TREATING INMATE HERE AT ELMORE PRISON WHERE THEIR IS NOT HEALTH CAREUNIT AT ALL IN THE CASE OF AN EMERGENCY WITH AN OFFICER JUST AS WELL WITH AN INMATE. "DEATH" WILL ACCURE WHERE THEIR IS NO HELP AT ALL AND THE INMATES ARE BEING TREATED LIKE DOGS BY THE OFFICERS,AND OFFICIALS OF SUPERVISORY POSSESSIONS: VIOLATED THE 8th AND 14th AMENDMEN RIGHTS OF THE INMATES WHILE THE OFFICIALS WERE ACTING UNDER COLOR OF STATE AND FEDERAL LAWS TO DEPRIVE THE INMATES OF THEIR GUARTEED CONSTITU TIONAL RIGHTS BY THE U.S. CONSTITUTION OF 1901.

SEE EXHIBIT A

What OFFICERS are not doing
And Supervisors Also,

^{#152683}
I. Aloysius T. Henry COMPLAINTIFF:

I ALSO HAVE A USE OF FORCE COMPLAINT FILED AGAINST THE OFFICIALS HERE AT ELMORE PRISON BY THE I.N.I. OFFICIALS LINA SHEPARD AND MR.HAWK:WHO CAME TO ME AFTER I WAS ASSAULTED BY INMATES AND OFFICERS HERE AT ELMORE CORRECTIONAL FACILITY IN 2016_-2017.WHERE I WAS SHIPED TO BULLOK PRISON AFTER I FILED A COMPLAINMENT AGAINST THE OFFICIALS. WHERE IM MENTAL HEALTH, AND ON MEDICATION FOR MY SCIKNESS AND SEE THERPHIST FOR MY PROBLEMS.

THE NEGLECT BY THE OFFICIALS AND I WAS TARGETTED BY OFFICERS PLACING HITS ON INMATES I WAS WHEN I WAS ASSAULTED BY THIS INMATE IN ELMORE PRISON.THE LACK OF SECURITY IN THIS PRISON IS VERY DANGEROUS,AND THE OFFICERS ARE NO BETTER COMING TO WORK WANTING TO "FIGHT" EVER DAY FOR NO REASON AT ALL,EITHER DRUNK OR JIGH ON SOMTHING OR DRUGED ON SOME PROTINE DRINK-BUST-BUSTER-MONSTER DRINK. WHICH HAS THE OFFICER THINKING AS "HULK-HOGGAN" BUT WITHOUT A FELONY OR A TRAFICKET-TICKET:

ALOYSIUS THADDEUS HENRY.#152683. WAS SATBBED IN THE "LUNG'S" IN MAY 2020
WHILE AT BULLOCK PRISON. WHERE NO OFFICER WAS IN THE DORM AT ALL, OR ROVER ON
THE FLOOR OF BULLOCK PRISON. THIS WAS NEGLECE ON THE OFFICIALS.A 8th AND
 14TH AMENDMENT VIOLATION FAILURE TO PROTECT VIOLATION OF A.D.O.C. RULES OF DORM OFFICERS A.R.508 AND DORM-ROVER A.R.506 CLEARLY VIOLATED BY THE OFFICIAL
 SEE DOCUMENTTATION AND EXHIBITS AND EVIDEENCE OF PICTURES:

*Nothing was done at all. NO Charges
 NO one went to Jail at all at Elmore
 For Assaulting me.*

*Five been under
 constant Threat
 And Assaults
 I am ALSO A.D.A.
 Testimony before Judge
 Nelson Thomas
 in 2016*

*SEE EXHIBIT
 A Attached*

PLAINTIFF STATES THAT THE LAW LIBRARY IS VERY INADEQUATE WITH NO CARBON FOR THE TYPE WRITERS AND NO TYPING PAPER FOR THE INMATES ^{OR EXEMPTED} EVEN UPON REQUESTING FOR EXTRA PAPER. WHERE THE LAW LIBRARY ALSO NEEDS NEW TYPE WRITERS FOR THE LAW LIBRARY. AND ALSO THE PRINTER IS NEEDED SO THAT INMATES CAN PRINT OFF CASES JUST LIKE THEIRS ARE SIMILURE TO THEIRS AND IT CAN BE SHOWN TO THE COURTS AS OF THE CITING(S). LACK OF PRINTER FOR THE LAW LIBRARY AND WHITE-OUT CORRECTION LIQUID PAPER. *Also NO up to date computer's & BICINATORY 2-20 for the law library at Elmore no printer which is needed - Bad (Y.A.I.)*

PLAINTIFF STATES THAT HE HAS NOT RECEIVED ANY TREATMENT AFTER HIS INJURIES BY ANY DOCTOR OR PHYSICAL THERAPY DOCTOR. WHERE THE OFFICERS HERE AT ELMORE NO'S ABOUT THIS INCIDENT WITH THE PLAINTIFF'S FROM BEING ASSAULTED HERE AT ELMORE PRISON. *In Nov 2020, Plaintiff's back was stricken 3-times in the back. Punctured right - arm.*

PLAINTIFF STATES THAT AN INCIDENT REPORT WAS DONE AND GIVEN TO SGT, SIMMONS AND I ALSO WENT TO RECEIVE A BODY CHART FOR MY INJURIES FROM BEING BEAT WITH A STICK AND BELT ACROSS MY BACK WHERE INVESTIGATIONS & INTELLIGENCE DIVISION MS. LENA SHEPHERD, AND MR. TODD HAWKES. Z TOOK PICTURES OF MY INJURIES TO MY BODY AND THEY ALSO CAME TO SEE ME UPON MY TRANSFER TO BULLOCK PRISON FROM ELMORE PRISON. CASE NUMBERS ON COMPLAINT. 18-2303 18-3084 AND 18-3122. REGARDING THE USE OF FORCE CASE(S). NOTHING CAME FROM THIS AT ALL AFTER BEING ASSAULTED BY THE OFFICERS AND THE INMATE.

PLAINTIFF STATES THAT THE LACK OF CLEANING SUPPLIES AND DOING THIS TIME OF THE CDSCD-19 THIS DEADLY WHERE THE INMATES HAVE NOT EVER RECEIVED ANY CLEANING SUPPLIES FOR THE DORMS AND THE INMATES HAVE NOT RECEIVED ANYTHING AT ALL TO KEEP DOWN WHAT EVER. *SEE EXHIBIT A FROM ANY SUST. BLM 18 2020*

PLAINTIFF STATES THEE INSIDE OF THE BUILDINGS ARE FULL OF ASBESTIUS AND LEAD PAINT WITHIN THE WALLS AND SELLING OF THE BUILDINGS AND CONCREAT IS *In showers - ceiling also.* OLD AND MELDUE JUST AS THE SHOWERS ARE ALSO MELDUE AND THE SHOWER FLOORS AND THE WALLS OF THE SHOWERS. WHERE WITH 196 OR 197 INMATES WITH ONLY

(4)-SHOWER'S IS UNCONSTITUTIONAL AND INHUMAINE. *(1) - Unusual - Mildred's all in the ceiling of the Bathroom and walls of the Bathroom.*

PLAINTIFF STATES THAT THE DORMS ARE ALWAYS LOCKED DOWN AND THEIR
IS NO PROPER AIR FLOW THREWOUT THE BUILDING IN ORDER FOR THE INMATES
TO RECEIVE FRESH AIR TO HELP WITH THEIR BREATHING. AND WHERE THEIR IS
NOT THE PROPER AIR FLOW INMATES CANNOT RECEIVE THE PROPER AIR FLOW
WITHIN THE BUILDINGS HERE AT ELMORE PRISON. ALSO THE BATHROOMS ARE
DISORDERED AND HAS ONLY (1) URINAL FOR OVER (196) INMATES WITHIN A
DORM. THIS IS NOT RIGHT AND ONLY (8) TOILETS AND (8) SINKS FOR OVER (196)
INMATES AND THE FIRE MARSHALL OF ELMORE COUNTY, ALABAMA AND THE HEALTH,
DEPARTMENT OF ELMORE COUNTY ALABAMA WILL BE HELD LIABLE FOR WHAT EVER
HAS HAPPEN AT THIS CAMP HERE IN ELMORE COUNTY, ALABAMA.

PLAINTIFF STATES ALL COUNTY COMMISSIONERS AND CITY COUNSELMEN WILL BE
 HELD LIABLE FOR THE NEGLECT OF THE BUILDING HERE AT ELMORE PRISON WHICH
 IS CONDEMNED AND CANNOT BE MAINTAINED PROPERLY DUE TO THE DOWNGRADE OF THE
 BUILDING WHICH IS IN BAD CONDITION AND ASBESTISTA IS ALL WITHIN THIS ^{old pipes} ^{2006 wires shown} ^{EVERY} ^{ALL}
 BUILDINGS AND ALSO LEAD-PAINT FROM OVER THE YEARS ³⁸ PAINTING OVER PAINT OVER
PAINT WHICH WAS LEAD PAINT FROM THE EARLY 90's AND EARLY LATE 80's AND
 THIS LEAD PAINT IS THEIR AND ASBESTISTA DUST PARTICLES THAT YOU CANNOT
 SEE WITH YOUR OWN EYES THAT YOU BREATHE IN UPON AIR FLOW. THE AIR IS
 BAD HERE FOR THE INMATES WITHIN THE DORMS DUE TO THE VENTILATION. AIR
 FLOW IS NOT GOOD AT ALL WITHIN THE DORM OF THE BUILDINGS HERE AT ELMORE.
 THERE IS ALSO NO MEDICAL STAFF HERE IN THE CASE OF AN EMERGENCY. WHERE
 INMATES WHO DIED HERE COULD HAVE BEEN SAVED IF THERE WAS A HEALTH CARE
 UNIT AT ELMORE JUST AS AT STATON, BULLOCK, VENTRESS, EASTERLING, AND ALL
 OTHER CAMPS WITHIN THE STATES AS OF A.D.O.C. THIS IS THE ONLY PRISON THAT
 DOES NOT HAVE A MEDICAL FACILITY, THEREFORE THIS PLACE SHOULD BE CLOSED
 FOR GOOD DUE TO THE LACK OF MEDICAL, LACK OF SECURITY, SAFETY, ON GOING
 KILLINGS THAT WILL NOT STOP, OFFICERS WORK HERE NEGLECT THEIR JOBS AND
 TURNED A BLIND EYE ON C. JACKSON COI, WELKES NIGHT SHIFT WHO ALLOWED C.
 JACKSON TO DIE AND DID NOT CALL FOR ANY HELP FOR THIS INMATE, WRONGFULL
 DEATH FOR C. JACKSON. ^{Every cubic in Elmore has a telephone to 911 (911) 3}
^{That's what 911 is for correct? Why didn't he call (911) 3}

COI, MAHONEY, COI. C. JOHNSON, SGT. HALL,
SGT. ROGERS, CAPTAIN MCKEE, WARDEN, BALDWIN
ALL HAVE BEEN ^{WAS} TOLD OF THE HARASSMENT. FROM
THESE OFFICERS, AND PLAINTIFF ALSO TOLD
SGT. GYARD ^{Wrote CHRISTOPHER JOHNSON BARR CELL I, N.E. ALSO} OF THE HARASSMENT BY COI. JOHNSON
AND COI. JOHNSON, WHERE THE INMATES WERE
ALLOWED TO GO TO THE CENTER ON THE 8-21-2020.
COI. JOHNSON TOOK UP I.D.'S FOR B1-DORM I
THE PLAINTIFF GAVE HIM MY I.D. TO GO TO THE
CENTER, UPON ENTERING THE CENTER, COI. MAHONEY
BEGAN TO MAKE UNJUST REMARKS, AND AS I
WAS ABOUT TO SPEAK, COI. JOHNSON TOLD ME
TO GET OUT OF THE KITCHEN CENTER LINE, SO
I DID JUST THAT. BUT KNOWING I DONE
NOTHING WRONG, I PROCEEDED TO THE SHIFT
OFFICE TO SPEAK WITH A SUPERVISOR, WHICH
WAS SGT. HALL, AND SGT. ROGERS, UPON MY
KNOCK, AND KNOCK AGAIN, SGT. HALL ONLY CAME
TOWARDS THE SHIFT OFFICE DOOR BUT WOULD
NOT RESPOND TO ME.

(1)

We here Col. L. Johnson who already called on his
 CB-Radio as I was told to get out of the
 Kitchen Center Line & Col. Johnson
 for Sgt. Hall and Sgt. Rogers to turn a "BLIND"
 "EYE" And should to NOT hear
 me call out for his help. To Also
 Turn a "DEFF-EAR" As a "SUPERVISOR"
 To Make sure all "Inmates are SAFE" SECURE
 "Treat Fairly" "Tactically" "Protected from Harm"
 "To not be Abused" Sgt. Hall and Sgt. Rogers both
 Turn a "DEFF-EAR" And Turn a "BLIND-EYE"
 To my problem, where if my or another persons
 life was in danger, then this inmate would
 have been there only because of the "supervisors"
"Neglect" and "misinformation" to cause harm
 and violate their own Rules of A.R. 208. Official
 conduct is very Bad-Behaviors, don't care about
~~them~~ No Inmates are care about. Where I
 left and went back to my Room-B1. And went
 this complaint up about these officers. ~~After~~
 Unprofessional Acts And (2) To cause harm or death by
 Neglect Acts done on purpose.

PLAINTIFF STATES THAT THE DORMS WITHIN THE BUILDINGS ARE UNFIT TO LIVE IN WHERE THE COUNTY HEALTH DEPARTMENT SHOULD HAVE CLOSED THIS PLACE DOWN YEARS AGO. WHERE THE FIRE AND SAFETY MARSHALL AND HEALTH DEPARTMENT WILL BE HELD LIABLE FOR THIS BUILDING AND ANY INJURIES THAT HAS HAPPEN AT THIS PLACE WHILE EVERYONE NEW OF THIS PROBLEM, WHERE THE DEPARTMENT OF CORRECTIONS HAS BEEN HAD WARDENS FROM OTHER CAMP'S COME AND STATE THAT THE CAMP IS SUTIABLE TO RUN AND IT'S UP KEEP IS VERY GOOD. WHICH IT IS NOT AT ALL. THE BUILDINGS ARE COMDEM AND THE PLUMBING IS BAD AND THE WARTER IS LIKE SUAGE AND THE KITCHEN IS FULL OF RATS AND ROCHES AND MICES AND MOLD IS ALL IN THE ROOF OF THE BATHROOMS CEILING AND WALLS OF THE BATHROOMS AND THE PLUMBING IS STOPED UP AND THEIR IS NO PROPER VENTALATION WITHIN THE T.V. ROOMS AND THE DOORMS, WHERE THE WINDOWS ARE COVERED WITH BAR-B-QUE SCREEN AND THE CUBIC FOR WHICH THE OFFICERS ARE STATIONED IN HAS REINFORCEMENT AROUND THE WINDOWS DOORS FOR THEIR SAFETY IN THE CASE OF INMATES RIOT'S. WHERE OFFICERS ARE ALSO WRITTING UP BOGUS DISCIPLINARYS ON INMATES, AND THE FOOD IS NOT AT ALL NUTRISHING AT ALL AND THE SPOONS AND GLASSES AND ALWAYS DIRTY AND THE KITCHEN IS DUE TO BE ALSO CLOSED. WHERE THE KITCHEN WORKERS ARE NOT BEING PROVIDED WITH CLEAN CLOTHING BY THE OFFICIALS AT ELMORE PRISON WHERE THE INMATE ALMOST HAS TO FIGHT TO RECEIVE CLOTHING FROM THE BACKGATE. WHERE THIS PRISON IS DUE TO BE CLOSED DOWN AT ONCE.

RELIEF SOUGHT

WHERE REQUESTING A TRIAL BY JURY, AND ANYOTHER RELIEF SOUGHT IN THIS CIVIL CLAIM, \$100.000 PUNTIVE DAMAGES FROM ALL DEFENDANTS. ACTUAL DAMAGE \$100.000 DAMAGES COMPENSATORY DAMAGES \$100.000 DAMAGES FROM ALL DEFENNANTS ALSO AN INJUNCTION PLACED AGAINST DEFENDANTS, WORKING INMATES IN TRASH AND NOT PAYING THEM AS OTHER INMATES WHO WALK THE ROAD GET PAID, WHATS THE DIFFERENCE? DONE THIS 25th DAY OF Sept 2020.

PLAINTIFF

Jimmy Holliman et al

PLAINTIFF

Ally to King et al

Constitutional Rights *APPOINTMENT OF CIVIL CASE COUNSEL'S*

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

TO HAVE A JURY TRIAL, AN INJUNCTION, A RESTRAINING ORDER PLACED ON DEFENDANT: AND A FULL INVESTIGATION ON ALL MATTERS OF ASSAULTS ON INMATES BY OFFICERS HERE AT ELMORE PRISON AND HAVING HITS PLACED ON INMATES BY OFFICERS AT ELMORE WHERE INMATES NEED ATTORNEYS, AND MENTAL HEALTH COUNSELORS, CLASSIFICATION IS ALSO BROKE DOWN, SUPERVISORS NO OF ASSAULTS AND DEATHS AND WANT DO NOTHING TO ASST IN ARRESTING OFFICERS OF NEGLECT. PUNITIVE DAMAGES \$500.000 EACH DEFENDANT. \$600.000 COMPENSATORY DAMAGES EACH DEFENDANT. \$400.000 ACTUAL DAMAGES EACH DEFENDANT. ANY OTHER RELIEF THE COURTS SEE FIT, WHERE ALL MENTAL HEALTH INMATES THAT NEED HELP.

Jimmy Hollins
Signature of plaintiff(s) *et, al*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9-28-20
(Date)

Jimmy Hollins
Signature of plaintiff(s)

MR. TIMMY HOPKINS 224418
2690 MARION STREET RD
EMORE, AL 36025
BI-6-A

29c4
Free
If note



Legal - Mail

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UNITED STATES DISTRICT COURT - Alabama
UNITED STATES DISTRICT COURT
MONTGOMERY, AL 36104